

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MASTEROBJECTS, INC.,

Plaintiff,

vs.

AMAZON.COM, INC.,

Defendant.

Case No. 1:20-cv-03478-PKC

**DECLARATION OF SCOTT SANFORD IN
SUPPORT OF DEFENDANT
AMAZON.COM, INC'S MOTION TO
TRANSFER VENUE TO THE NORTHERN
DISTRICT OF CALIFORNIA**

I, Scott Sanford, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I make this declaration in support of Defendant Amazon.com, Inc's ("Amazon") Motion to Transfer Venue to the Northern District of California ("NDCA"). I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am the Senior Corporate Counsel of Intellectual Property Litigation and Licensing for Amazon. In this role, I handle legal matters relating to patent litigation, infringement, and protection of Amazon's technology and software. I have been employed by Amazon since December 2009.

3. I understand that in the above-captioned litigation, MasterObjects, Inc. ("MasterObjects") is alleging that Amazon's Autocomplete search technology infringes on United States Patents No. 8,539,024, No. 9,760,628, No. 10,311,073, and No. 10,394,866.

4. Amazon is a Delaware entity with its headquarters and principal place of business in Seattle, Washington.

5. Amazon has significant ties to San Francisco, where it has operated since 1999 with its acquisition of Alexa Internet, a maker of website measurement tools. Over the years, Amazon has expanded its footprint in San Francisco due to the abundant software engineering and data

science talent in Silicon Valley.

6. Amazon's Autocomplete search technology was designed and developed by Amazon's A9 team in Palo Alto, California in or around 2003. Amazon's A9 team continues to manage, operate, and service this technology out of Palo Alto. The engineers most knowledgeable about the inception, design, development, and operation of the Autocomplete technology work in Amazon's facility in Palo Alto. These employees, including Rohit Patki, Andy Sun, Hoshun Yang, Anoop Johnson, Haiyang Zhang, Uma Murthy, Lakshmi Ramachandran, and Xuyang Zheng, are important to Amazon's business and their absence for significant periods of time would adversely affect Amazon.

7. To my knowledge, any documents, including analytics or computer source code documents, relating to Amazon's Autocomplete search technology, would be in NDCA, not in the Southern District of New York ("SDNY").

8. To my knowledge, of the former Amazon employees that were involved in designing and developing Amazon's Autocomplete search technology, seven reside in NDCA (Matt Amacker, Saj Raza, Juzer Arsiwala, Anil Sewani, Louka Dlagnekov, Yih Sun, and Helen Lu) and two reside in nearby Seattle, Washington (Ruben Ortega and Robert Frederick).

9. To my knowledge, Amazon does not have any documents or current or former employees or business operations in SDNY that relate to the accused Autocomplete search technology.

10. I understand that MasterObjects identified eight New York-based Amazon employees, in its initial disclosures, that it speculates may have information relevant to the Autocomplete search technology. To my knowledge, and based upon my inquiries, these employees do not have relevant information or testimony relating to the Autocomplete search technology at issue in this action.

11. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of August, 2020.

/s/ Scott Sanford
Scott Sanford